

R. Brent Wisner (SBN: 276023)  
[rbwisner@wisnerbaum.com](mailto:rbwisner@wisnerbaum.com)  
Monique Alarcon (SBN: 311650)  
[malarcon@wisnerbaum.com](mailto:malarcon@wisnerbaum.com)  
Pedram Esfandiary (SBN: 312569)  
[pesfandiary@wisnerbaum.com](mailto:pesfandiary@wisnerbaum.com)  
Mayra Maturana (SBN: 346539)  
[mmaturana@wisnerbaum.com](mailto:mmaturana@wisnerbaum.com)  
**WISNER BAUM, LLP**  
11111 Santa Monica Blvd., Suite 1750  
Los Angeles, CA 90025  
Tel: (310) 207-3233  
Fax: (310) 820-7444

*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: BABY FOOD PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

CASANDRA ISZA, on Behalf of R.D.I, A  
MINOR,

*Plaintiff,*

v.

Beech-Nut Nutrition Company, Danone North  
America, PBC, Danone Nutricia Nederland BV,  
Gerber Products Company, Hain Celestial Group,  
Inc., Nestlé USA, Inc., Nestlé Enterprises S.A.,  
Société des Produits Nestlé S.A., Nurture, LLC,  
and Walmart, Inc.

*Defendants.*

Case No. 24-MD-3101-JSC

MDL 3101

Hon. Jacqueline Scott Corley

SHORT-FORM COMPLAINT AND JURY  
DEMAND

Civil Action No. 3:25-cv-5694

Come now Plaintiff, named below, and files a Complaint against the Defendant(s) named below for personal injuries suffered as a result of Plaintiff's consumption of Defendant(s) Contaminated Baby Food products, which contain Toxic Heavy Metals.

Plaintiff incorporates by reference the allegations contained in the First Amended Master Long-Form Complaint, filed in MDL 3101 (ECF Docket No. 197), as well as any further amendments made to that First Amended Master Long-Form Complaint.

Pursuant to Pretrial Order No. 5, this Complaint is filed as a severed action from the originally bundled case, CAND Case No. 3:24-cv-02485-JSC.

Plaintiff further states as follows:

### I. PARTIES

1. Plaintiff: R.D.I..
2. Personal Representative/Guardian *ad litem*: Casandra Isza. A guardian *ad litem*, if not yet appointed, will need to be appointed by the Court pursuant to PTO No. 14. The filing of this complaint does not establish a guardian *ad litem* relationship.
3. Plaintiff is suing the following Defendant(s):

Check All Applicable Defendants	Defendant(s)
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company ("Beech-Nut")
<input type="checkbox"/>	The Campbell's Company ("Campbell")
<input checked="" type="checkbox"/>	Danone North America, PBC ("Danone North America")
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV ("Danone ELN")
<input checked="" type="checkbox"/>	Gerber Products Company ("Gerber")
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. ("Hain")
<input type="checkbox"/>	Neptune Wellness Solutions ("Neptune")
<input checked="" type="checkbox"/>	Nestlé USA, Inc. ("Nestlé USA")
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. ("Nestlé Enterprises")
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. ("SPN")
<input checked="" type="checkbox"/>	Nurture, LLC ("Nurture")
<input type="checkbox"/>	Plum, PBC ("Plum")
<input type="checkbox"/>	Sprout Foods, Inc. ("Sprout Foods")
<input type="checkbox"/>	Sun-Maid Growers of California ("Sun-Maid")
<input checked="" type="checkbox"/>	Walmart, Inc. ("Walmart")

4. Additional allegations not contained in the First Amended Master Long-Form Complaint, attach additional pages if necessary:

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## II. JURISDICTION AND VENUE

1. Plaintiff files this Complaint pursuant to CMO No. 5, and are to be bound by the rights, protections, and privileges, and obligations of that CMO and other Orders of the Court.
2. Plaintiff's City and State of Residence is: Citrus Springs, Florida.
3. Pursuant to CMO No. 5, Plaintiff hereby designates the United States District Court for the Middle District of Florida as Plaintiff's designated venue ("Original Venue").
4. Plaintiff makes this selection based upon one (or more) of the following factors:
  - ☒ Plaintiff currently resides in the Original Venue.
  - ☐ Plaintiff purchased and consumed Defendant(s) products in the Original Venue.
  - ☐ The Original Venue is a judicial district in which Defendant(s) reside(s), and such Defendant(s) is/are residents of the State in which the district is located (28 U.S.C. 1391(b)(1)).
  - ☐ The Original Venue is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, specially (28 U.S.C. 1391 (b)(2)).
  - ☐ There is no district in which an action may otherwise be brought under 28 U.S.C. 1391, and the Original Venue is a judicial district in which Defendant(s) is/are subject to the Court's personal jurisdiction with respect to this action (28 U.S.C. 1391 (b)(3)).
  - ☐ Other reason (please explain): \_\_\_\_\_.
5. Basis for Subject Matter Jurisdiction (check all that apply)
  - ☒ Diversity of Citizenship: Plaintiff alleges that they are not citizens of any state where the named Defendant(s) are also citizens.
  - ☐ Federal Question

☐ Other (please explain): \_\_\_\_\_.

### III. CASE-SPECIFIC ALLEGATIONS

1. Plaintiff began consuming each Defendant(s) Baby Food product(s) on or about the approximate time periods set forth immediately below (by defendant and product category) in the product identification chart. For the purpose of the chart below, the approximate start and end dates will be provided for each of the product categories reflected in bold in the second column below (e.g., Jars/Tubs, Pouches, Cereals, Bars, Yogurt Meals, Baked Crisps, and Infant Formula).

2. To the best recollection of the individuals who fed Plaintiff Baby Food products, it is alleged that Plaintiff consumed the following Baby Food product(s) which Plaintiff contends caused and/or contributed to Plaintiff's injury(ies) and brings claims against the following Defendants:

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
<b>A. Beech-Nut</b>	<u><b>Jars</b></u> <input type="checkbox"/> 1. Stage 1 Apple <input type="checkbox"/> 2. Stage 1 Banana <input type="checkbox"/> 3. Stage 1 Beef & Beef Broth <input type="checkbox"/> 4. Stage 1 Butternut Squash <input type="checkbox"/> 5. Stage 1 Carrots <input type="checkbox"/> 6. Stage 1 Chicken & Chicken Broth <input type="checkbox"/> 7. Stage 1 Green Beans <input checked="" type="checkbox"/> 8. Stage 1 Organics Apple <input checked="" type="checkbox"/> 9. Stage 1 Organics Carrots <input type="checkbox"/> 10. Stage 1 Organics Pear <input type="checkbox"/> 11. Stage 1 Organics Sweet Potato <input checked="" type="checkbox"/> 12. Stage 1 Organics Prunes <input checked="" type="checkbox"/> 13. Stage 1 Organics Pumpkin <input type="checkbox"/> 14. Stage 1 Pear <input type="checkbox"/> 15. Stage 1 Prunes <input type="checkbox"/> 16. Stage 1 Sweet Potato <input type="checkbox"/> 17. Stage 1 Turkey & Turkey Broth <input type="checkbox"/> 18. Stage 2 Apple <input type="checkbox"/> 19. Stage 2 Apple & Banana <input type="checkbox"/> 20. Stage 2 Apple & Blackberries <input type="checkbox"/> 21. Stage 2 Apple & Blueberries <input type="checkbox"/> 22. Stage 2 Apple & Kale	<u><b>Jars</b></u> 2020 – 2021 <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i>

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 23. Stage 2 Apple, Cinnamon & Granola <input type="checkbox"/> 24. Stage 2 Apple, Mango & Kiwi <input type="checkbox"/> 25. Stage 2 Apple, Pear & Banana <input type="checkbox"/> 26. Stage 2 Banana <input type="checkbox"/> 27. Stage 2 Banana & Strawberries <input type="checkbox"/> 28. Stage 2 Banana, Blueberries & Green beans <input type="checkbox"/> 29. Stage 2 Banana, Orange & Pineapple <input type="checkbox"/> 30. Stage 2 Carrots, Sweet Corn & Pumpkin <input type="checkbox"/> 31. Stage 2 Chicken, Apple & Carrot <input type="checkbox"/> 32. Stage 2 Chicken, Apple & Corn <input type="checkbox"/> 33. Stage 2 Chicken, Pear & Zucchini <input type="checkbox"/> 34. Stage 2 Corn & Sweet Potato <input type="checkbox"/> 35. Stage 2 Garden Vegetables <input type="checkbox"/> 36. Stage 2 Guava, Pear & Strawberries <input type="checkbox"/> 37. Stage 2 Mango <input type="checkbox"/> 38. Stage 2 Mango, Apple & Avocado <input type="checkbox"/> 39. Stage 2 Mixed Vegetables <input type="checkbox"/> 40. Stage 2 Organics Apple, Kiwi & Spinach <input type="checkbox"/> 41. Stage 2 Organics Apple, Pumpkin & Granola <input type="checkbox"/> 42. Stage 2 Organics Apple, Raspberries & Avocado <input type="checkbox"/> 43. Stage 2 Organics Banana <input type="checkbox"/> 44. Stage 2 Organics Banana, Cinnamon & Granola <input type="checkbox"/> 45. Stage 2 Organics Banana, mango & Sweet Potato <input type="checkbox"/> 46. Stage 2 Organics Butternut Squash & Sweet Corn <input checked="" type="checkbox"/> 47. Stage 2 Organics Pear, Kale & Cucumber <input type="checkbox"/> 48. Stage 2 Peach <input type="checkbox"/> 49. Stage 2 Pear <input checked="" type="checkbox"/> 50. Stage 2 Pear & Blueberries <input type="checkbox"/> 51. Stage 2 Pear & Pineapple <input checked="" type="checkbox"/> 52. Stage 2 Pear & Raspberries <input type="checkbox"/> 53. Stage 2 Peas, Green Beans & Asparagus <input checked="" type="checkbox"/> 54. Stage 2 Pineapple, Pear & Avocado <input type="checkbox"/> 55. Stage 2 Pumpkin & Cinnamon <input type="checkbox"/> 56. Stage 2 Spinach, Zucchini & Peas <input type="checkbox"/> 57. Stage 2 Squash	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input checked="" type="checkbox"/> 58. Stage 2 Sweet Carrots <input type="checkbox"/> 59. Stage 2 Sweet Corn & Green Beans <input type="checkbox"/> 60. Stage 2 Sweet Peas <input checked="" type="checkbox"/> 61. Stage 2 Sweet Potato <input type="checkbox"/> 62. Stage 2 Turkey, Apple & Sweet Potato <input type="checkbox"/> 63. Stage 3 Naturals Superblends Apple, Yogurt, Cinnamon & Oat <input type="checkbox"/> 64. Stage 3 Naturals Superblends Banana, Chickpea & Kale <input type="checkbox"/> 65. Stage 3 Naturals Superblends Carrot, Corn & Chickpea <input type="checkbox"/> 66. Stage 3 Naturals Superblends Mango, Carrot, Yogurt & Oat <input type="checkbox"/> 67. Stage 3 Organics Sweet Potato & Barley <b><u>Pouches</u></b> <input type="checkbox"/> 68. Stage 2 Apple & Kale <input type="checkbox"/> 69. Stage 2 Apple, Mango & Carrot <input type="checkbox"/> 70. Stage 2 Apple, Mango & Spinach <input type="checkbox"/> 71. Stage 2 Apple, Peach & Strawberries <input type="checkbox"/> 72. Stage 2 Apple, Pumpkin & Cinnamon <input type="checkbox"/> 73. Stage 2 Apple, Sweet Potato & Pineapple <input type="checkbox"/> 74. Stage 2 Banana, Apple & Blueberries <input type="checkbox"/> 75. Stage 2 Banana, Apple & Strawberry <input type="checkbox"/> 76. Stage 2 Banana, Blueberries & Avocado <input type="checkbox"/> 77. Stage 2 Banana, Cinnamon & Granola <input type="checkbox"/> 78. Stage 2 Banana, Pear & Sweet Potato <input type="checkbox"/> 79. Stage 2 Carrot Zucchini & Pear <input type="checkbox"/> 80. Stage 2 Carrot, Apple & Pineapple <input type="checkbox"/> 81. Stage 2 Peach, Apple & Banana <input type="checkbox"/> 82. Stage 2 Pear, Banana & Raspberries <input type="checkbox"/> 83. Stage 2 Pear, Mango & Squash <input type="checkbox"/> 84. Stage 2 Pumpkin, Zucchini & Apple <input type="checkbox"/> 85. Stage 2 Squash, Peas & Pears <input type="checkbox"/> 86. Stage 2 Zucchini, Spinach & Banana <input type="checkbox"/> 87. Stage 3 Apple, Yogurt, Cinnamon & Oat <input type="checkbox"/> 88. Stage 4 Yogurt, Banana & Mixed Berry <input type="checkbox"/> 89. Stage 4 Yogurt, Banana & Strawberry <b><u>Cereals</u></b> <input type="checkbox"/> 90. Multigrain Cereal	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 91. Oatmeal Cereal <input type="checkbox"/> 92. Organic Oatmeal Cereal <input type="checkbox"/> 93. Rice Cereal  <b><u>Bars</u></b> <input type="checkbox"/> 94. Apple & Spinach Fruit & Veggie <input type="checkbox"/> 95. Banana & Pumpkin Fruit & Veggie <input type="checkbox"/> 96. Banana Fruity Oat <input type="checkbox"/> 97. Strawberry Fruity Oat  <b><u>Yogurt Melts</u></b> <input type="checkbox"/> 98. Apple & Pumpkin Fruit & Veggie <input type="checkbox"/> 99. Apple, Carrot, Mango & Yogurt Melties with Probiotics <input type="checkbox"/> 100. Banana, Blueberry & Green Beans Fruit & Veggie <input type="checkbox"/> 101. Pear, Mango, Spinach & Yogurt Melties with Probiotics <input type="checkbox"/> 102. Strawberry, Apple & Yogurt  <b><u>Baked Crisps</u></b> <input type="checkbox"/> 103. Sweet Potato	
<b>B. Gerber</b>	<b><u>Jars and Tubs</u></b> <input checked="" type="checkbox"/> 1. Stage 1 - 1st Butternut Squash <input checked="" type="checkbox"/> 2. Stage 1 - 1st Carrot <input checked="" type="checkbox"/> 3. Stage 1 - 1st Foods Apple <input checked="" type="checkbox"/> 4. Stage 1 - 1st Foods Banana <input checked="" type="checkbox"/> 5. Stage 1 - 1st Foods Prune <input checked="" type="checkbox"/> 6. Stage 1 - 1st Foods Sweet Potato <input checked="" type="checkbox"/> 7. Stage 1 - 1st Green Bean <input checked="" type="checkbox"/> 8. Stage 1 - 1st Natural Apple <input checked="" type="checkbox"/> 9. Stage 1 - 1st Natural Banana <input checked="" type="checkbox"/> 10. Stage 1 - 1st Pea <input checked="" type="checkbox"/> 11. Stage 1 - 1st Peach <input checked="" type="checkbox"/> 12. Stage 1 - 1st Pear <input checked="" type="checkbox"/> 13. Stage 2 - 2nd Apple Avocado <input checked="" type="checkbox"/> 14. Stage 2 - 2nd Apple Banana with Mixed Cereal <input checked="" type="checkbox"/> 15. Stage 2 - 2nd Banana Plum Grape <input checked="" type="checkbox"/> 16. Stage 2 - 2nd Foods Apple <input checked="" type="checkbox"/> 17. Stage 2 - 2nd Foods Apple Banana with	<b><u>Jars and Tubs</u></b> 2020 – 2020 <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i>

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<p>Oatmeal</p> <p><input checked="" type="checkbox"/> 18. Stage 2 - 2nd Foods Apple Blueberry</p> <p><input checked="" type="checkbox"/> 19. Stage 2 - 2nd Foods Apple Strawberry Banana</p> <p><input checked="" type="checkbox"/> 20. Stage 2 - 2nd Foods Apricot Mixed Fruit</p> <p><input checked="" type="checkbox"/> 21. Stage 2 - 2nd Foods Banana</p> <p><input checked="" type="checkbox"/> 22. Stage 2 - 2nd Foods Banana Apple Pear</p> <p><input checked="" type="checkbox"/> 23. Stage 2 - 2nd Foods Banana Blackberry Blueberry</p> <p><input checked="" type="checkbox"/> 24. Stage 2 - 2nd Foods Banana Carrot Mango</p> <p><input checked="" type="checkbox"/> 25. Stage 2 - 2nd Foods Banana Orange Medley</p> <p><input checked="" type="checkbox"/> 26. Stage 2 - 2nd Foods Banana Pear Zucchini</p> <p><input checked="" type="checkbox"/> 27. Stage 2 - 2nd Foods Beef and Gravy</p> <p><input checked="" type="checkbox"/> 28. Stage 2 - 2nd Foods Butternut Squash</p> <p><input checked="" type="checkbox"/> 29. Stage 2 - 2nd Foods Carrot</p> <p><input checked="" type="checkbox"/> 30. Stage 2 - 2nd Foods Carrot Potato Pea</p> <p><input checked="" type="checkbox"/> 31. Stage 2 - 2nd Foods Chicken and Gravy</p> <p><input checked="" type="checkbox"/> 32. Stage 2 - 2nd Foods Cinnamon with Oatmeal</p> <p><input checked="" type="checkbox"/> 33. Stage 2 - 2nd Foods Green Bean</p> <p><input checked="" type="checkbox"/> 34. Stage 2 - 2nd Foods Ham and Gravy</p> <p><input checked="" type="checkbox"/> 35. Stage 2 - 2nd Foods Mango</p> <p><input checked="" type="checkbox"/> 36. Stage 2 - 2nd Foods Pea</p> <p><input checked="" type="checkbox"/> 37. Stage 2 - 2nd Foods Peach</p> <p><input checked="" type="checkbox"/> 38. Stage 2 - 2nd Foods Pear</p> <p><input checked="" type="checkbox"/> 39. Stage 2 - 2nd Foods Pear Pineapple</p> <p><input checked="" type="checkbox"/> 40. Stage 2 - 2nd Foods Prune Apple</p> <p><input checked="" type="checkbox"/> 41. Stage 2 - 2nd Foods Sweet Potato</p> <p><input checked="" type="checkbox"/> 42. Stage 2 - 2nd Foods Sweet Potato Turkey with Whole Grains Dinner</p> <p><input checked="" type="checkbox"/> 43. Stage 2 - 2nd Foods Turkey and Gravy</p> <p><input checked="" type="checkbox"/> 44. Stage 2 - 2nd Natural Apple Zucchini Peach</p> <p><input checked="" type="checkbox"/> 45. Stage 2 - 2nd Natural Spinach Kale</p> <p><input checked="" type="checkbox"/> 46. Stage 2 - 2nd Pear Guava</p> <p><input type="checkbox"/> 47. Stage 3 - 3rd Banana Blueberry Rice pudding</p> <p><input type="checkbox"/> 48. Stage 3 - 3rd Garden Veggies &amp; Rice</p> <p><input type="checkbox"/> 49. Stage 3 - 3rd Pasta Marinara</p> <p><input type="checkbox"/> 50. Stage 3 - 3rd Pasta Primavera</p> <p><b><u>Pouches</u></b></p> <p><input checked="" type="checkbox"/> 51. Toddler Pouched Organic Banana Mango</p>	<p><b><u>Pouches</u></b></p> <p>2020 – 2020</p>



Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input checked="" type="checkbox"/> 52. Toddler Pouches Apple Mango Strawberry <input checked="" type="checkbox"/> 53. Toddler Pouches Banana Blueberry <input checked="" type="checkbox"/> 54. Toddler Pouches Banana Blueberry Purple Carrot Greek Yogurt Purple Carrot Greek Yogurt Mixed Grains <input type="checkbox"/> 55. Toddler Pouches Banana Pear Zucchini <input type="checkbox"/> 56. Toddler Pouches Fruit & Yogurt Peaches & Cream <input type="checkbox"/> 57. Toddler Pouches Fruit & Yogurt Strawberry Banana <input type="checkbox"/> 58. Toddler Pouches Fruit & Yogurt Very Berry <input type="checkbox"/> 59. Toddler Pouches Natural Apple Pear Peach <input type="checkbox"/> 60. Toddler Pouches Natural Apple Sweet Potato with Cinnamon <input checked="" type="checkbox"/> 61. Toddler Pouches Organic Apple Mango Raspberry Avocado Oatmeal <input checked="" type="checkbox"/> 62. Toddler Pouches Organic Apple Purple Carrot Blueberry with Yogurt <input checked="" type="checkbox"/> 63. Toddler Pouches Organic Banana Mango Avocado Quinoa Vanilla <input checked="" type="checkbox"/> 64. Toddler Pouches Organic Banana Raspberry & Yogurt with Vanilla <input checked="" type="checkbox"/> 65. Toddler Pouches Organic Banana Strawberry Beet Oatmeal <input checked="" type="checkbox"/> 66. Toddler Pouches Organic Mango Peach Carrot Sweet Potato Oatmeal <input type="checkbox"/> 67. Stage 2 - 2nd Foods Pouches Apple Strawberry Banana <input type="checkbox"/> 68. Stage 2 - 2nd Foods Pouches Natural Banana <input checked="" type="checkbox"/> 69. Stage 2 - 2nd Foods Pouches Organic Apple Blueberry Spinach <input checked="" type="checkbox"/> 70. Stage 2 - 2nd Foods Pouches Organic Apple Carrot Squash <input checked="" type="checkbox"/> 71. Stage 2 - 2nd Foods Pouches Organic Apple Kale Fig <input checked="" type="checkbox"/> 72. Stage 2 - 2nd Foods Pouches Organic Apple Peach <input checked="" type="checkbox"/> 73. Stage 2 - 2nd Foods Pouches Organic Apple	<i>Additionally, products that  Plaintiff consumed, and the time  period of consumption, may be  reflected in retailer records in  the possession of third parties.</i>

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<p>Raspberry Acai Berry</p> <p><input checked="" type="checkbox"/> 74. Stage 2 - 2nd Foods Pouches Organic Apple Zucchini Spinach Strawberry</p> <p><input checked="" type="checkbox"/> 75. Stage 2 - 2nd Foods Pouches Organic Banana Acai Berry Mixed Grain</p> <p><input checked="" type="checkbox"/> 76. Stage 2 - 2nd Foods Pouches Organic Banana Blueberry Blackberry Oatmeal</p> <p><input checked="" type="checkbox"/> 77. Stage 2 - 2nd Foods Pouches Organic Carrot Apple Mango</p> <p><input checked="" type="checkbox"/> 78. Stage 2 - 2nd Foods Pouches Organic Pear Mango Avocado</p> <p><input checked="" type="checkbox"/> 79. Stage 2 - 2nd Foods Pouches Organic Pear Peach Strawberry</p> <p><input checked="" type="checkbox"/> 80. Stage 2 - 2nd Foods Pouches Organic Purple Carrot Banana Acai Cardamom</p> <p><input checked="" type="checkbox"/> 81. Stage 2 - 2nd Foods Pouches Organic Squash Apple Sweet Potato</p> <p><input checked="" type="checkbox"/> 82. Stage 2 - 2nd Foods Pouches Organic Squash Pear Peach with Basil</p> <p><b><u>Cereals</u></b></p> <p><input checked="" type="checkbox"/> 83. Apple Cinnamon Oatmeal &amp; Barley Cereal</p> <p><input checked="" type="checkbox"/> 84. Banana &amp; Cream Oatmeal &amp; Barley Cereal</p> <p><input type="checkbox"/> 85. Banana Apple Strawberry Multigrain Cereal</p> <p><input type="checkbox"/> 86. DHA &amp; Probiotic Rice Cereal</p> <p><input type="checkbox"/> 87. Lil'Bits Oatmeal Banana Strawberry Cereal</p> <p><input type="checkbox"/> 88. Multi Grain Cereal</p> <p><input type="checkbox"/> 89. Multigrain Cereal</p> <p><input type="checkbox"/> 90. Oatmeal</p> <p><input type="checkbox"/> 91. Oatmeal Banana Probiotic Cereal</p> <p><input type="checkbox"/> 92. Organic Oatmeal</p> <p><input checked="" type="checkbox"/> 93. Organic Oatmeal Banana Cereal</p> <p><input checked="" type="checkbox"/> 94. Organic Oatmeal Millet Quinoa Cereal</p> <p><input checked="" type="checkbox"/> 95. Organic Single-Grain Rice</p> <p><input type="checkbox"/> 96. Probiotic Oatmeal, Lentil, Carrots &amp; Peas</p> <p><input type="checkbox"/> 97. Probiotic Rice Banana Apple Cereal</p> <p><input type="checkbox"/> 98. Single Grain Rice Cereal</p> <p><input type="checkbox"/> 99. Whole Wheat Apple Blueberry Cereal</p> <p><input type="checkbox"/> 100. Whole Wheat Cereal</p> <p><b><u>Puff Snacks</u></b></p> <p><input type="checkbox"/> 101. Apple Cinnamon Puffs</p>	<p><b><u>Cereals</u></b></p> <p>2020 – 2020</p> <p><i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i></p> <p><b><u>Puff Snacks</u></b></p> <p>2020 – 2020</p>

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<div> <input type="checkbox"/> 102. Apple Sweet Potato Lil' Crunchies <input checked="" type="checkbox"/> 103. Banana Puffs <input checked="" type="checkbox"/> 104. Blueberry Puffs <input type="checkbox"/> 105.Cranberry Orange Organic Puffs <input type="checkbox"/> 106. Fig Berry Organic Puffs <input type="checkbox"/> 107. Garden Tomato Lil' Crunchies <input type="checkbox"/> 108. Mild Cheddar Lil' Crunchies <input checked="" type="checkbox"/> 109. Organic Apple Puffs <input type="checkbox"/> 110. Organic Banana Raspberry Baby Pops <input type="checkbox"/> 111. Organic Lil' Crunchies White Bean Hummus <input type="checkbox"/> 112. Organic Lil' Crunchies White Cheddar Broccoli <input type="checkbox"/> 113. Peach Puffs <input type="checkbox"/> 114. Ranch Lil' Crunchies <input checked="" type="checkbox"/> 115. Strawberry Apple Puffs <input checked="" type="checkbox"/> 116. Sweet Potato Puffs <input type="checkbox"/> 117. Vanilla Maple Lil' Crunchies <input type="checkbox"/> 118. Vanilla Puffs <input type="checkbox"/> 119. Veggie Dip Lil' Crunchies </div> <div> <p><b><u>Biscuits and Cookies</u></b></p> <input type="checkbox"/> 120. Animal Crackers <input type="checkbox"/> 121. Arrowroot Biscuits <input type="checkbox"/> 122. Banana Cookies <input type="checkbox"/> 123. Lil' Biscuits <input type="checkbox"/> 124. Organic Honey Biscuits </div> <div> <p><b><u>Grain Bars</u></b></p> <input type="checkbox"/> 125. Apple Cinnamon Soft Baked Grain Bars <input type="checkbox"/> 126. Banana Mango Organic Grain &amp; Grow Soft Baked Grain Bars <input type="checkbox"/> 127. Date &amp; Carrot Organic Date &amp; Carrot Fruit &amp; Veggie Bars <input type="checkbox"/> 128. Organic Raspberry Pomegranate Grain &amp; Grow Soft Baked Grain Bars <input type="checkbox"/> 129. Strawberry Banana Soft Baked Grain Bars </div> <div> <p><b><u>Teethers/Wafers</u></b></p> <input type="checkbox"/> 130. Apple Harvest Teether Wheels <input type="checkbox"/> 131. Banana Cream Teether Wheels <input checked="" type="checkbox"/> 132. Banana Peach Teethers </div>	<div> <p><i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i></p> </div> <div> <p><b><u>Teethers/Wafers</u></b></p> <p>2020 –2020</p> <p><i>Additionally, products that Plaintiff consumed, and the time</i></p> </div>

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 133. Banana Soothe 'n' Chew <input type="checkbox"/> 134. Banana Yogurt Blends Snacks <input type="checkbox"/> 135. Blueberry with Whole Grains Yogurt Blends Snack <input checked="" type="checkbox"/> 136. Mango Banana Carrot Organic Teethers <input type="checkbox"/> 137. Mango Raspberry Teethers <input type="checkbox"/> 138. Organic Teethers Blueberry Apple Beet <input type="checkbox"/> 139. Peach Yogurt Melts <input checked="" type="checkbox"/> 140. Strawberry Apple Spinach Teethers <input type="checkbox"/> 141. Strawberry Banana Yogurt Blends Snack	<i>period of consumption, may be reflected in retailer records in the possession of third parties.</i>
C. Hain	<u><b>Jars</b></u> <input type="checkbox"/> 1. Apple Butternut Squash <input type="checkbox"/> 2. Apple Cinnamon Oatmeal <input type="checkbox"/> 3. Apples <input type="checkbox"/> 4. Apples & Apricots <input type="checkbox"/> 5. Apples & Blueberries <input type="checkbox"/> 6. Apples & Plums <input type="checkbox"/> 7. Banana Mango <input type="checkbox"/> 8. Bananas <input type="checkbox"/> 9. Bananas Peaches & Raspberries <input type="checkbox"/> 10. Carrots <input type="checkbox"/> 11. Chicken & Chicken Broth <input type="checkbox"/> 12. Chicken & Rice <input type="checkbox"/> 13. Corn & Butternut Squash <input type="checkbox"/> 14. Peach Oatmeal Banana <input type="checkbox"/> 15. Pears <input type="checkbox"/> 16. Pears & Mangos <input type="checkbox"/> 17. Pears & Raspberries <input type="checkbox"/> 18. Peas <input type="checkbox"/> 19. Sweet Potato Apricot <input type="checkbox"/> 20. Sweet Potato Chicken <input type="checkbox"/> 21. Sweet Potatoes <input type="checkbox"/> 22. Tender Chicken & Stars <input type="checkbox"/> 23. Turkey & Turkey Broth <input type="checkbox"/> 24. Vegetable Turkey <input type="checkbox"/> 25. Winter Squash  <u><b>Pouches</b></u> <input type="checkbox"/> 26. Apple Peach Oatmeal Fruit and Grain Puree	<u><b>Pouches</b></u> 2020 –2020 <i>Additionally, products that</i>

[illegible]

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 58. Blueberry Breakfast Biscuits <input type="checkbox"/> 59. Honey Crunchin'Grahams <input type="checkbox"/> 60. Oatmeal Cinnamon Organic Letter of the Day Cookies <input type="checkbox"/> 61. Organic Crunchin'Crackers <input type="checkbox"/> 62. Organic Garden Veggie Straws <input checked="" type="checkbox"/> 63. Organic Peanut Butter Puffs <input type="checkbox"/> 64. Strawberry Sunny Days Snack Bars <input type="checkbox"/> 65. Sweet Potato Carrot Sunny Days Snack Bars <input checked="" type="checkbox"/> 66. Veggie Crunchin'Crackers  <b><u>Frozen Entrees and Meals</u></b> <input type="checkbox"/> 67. Frozen Baked Chicken Nuggets Value Size <input type="checkbox"/> 68. Frozen Baked Chicken Nuggets <input type="checkbox"/> 69. Frozen Baked Popcorn Chicken Nuggets <input type="checkbox"/> 70. Frozen Gluten Free Broccoli & Cheese Nuggets <input type="checkbox"/> 71. Frozen Gluten Free Veggie Nuggets <input type="checkbox"/> 72. Frozen Mini Beef Meatballs <input type="checkbox"/> 73. Frozen Plant Based Protein Nuggets <input type="checkbox"/> 74. Organic Frozen Chicken Fries <input type="checkbox"/> 75. Organic Frozen Mini Pancakes Blueberry  <b><u>Fruit Yogurt Smoothies</u></b> <input type="checkbox"/> 76. Mixed Berry Fruit Yogurt Smoothie <input type="checkbox"/> 77. Peach Banana Fruit Yogurt Smoothie <input type="checkbox"/> 78. Pear Mango Fruit Yogurt Smoothie <input type="checkbox"/> 79. Pineapple Orange Banana Fruit Yogurt Smoothie <input type="checkbox"/> 80. Strawberry Banana Fruit Yogurt Smoothie  <b><u>Electrolyte Solution</u></b> <input type="checkbox"/> 81. Apple Orange Electrolyte Solution <input type="checkbox"/> 82. Grape Electrolyte Solution	<i>third parties.</i> <b><u>Snacks</u></b> 2020 – 2020 <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i>
<b>D. Nurture</b>	<b><u>Jars</u></b> <input type="checkbox"/> 1. Apple & Spinach <input type="checkbox"/> 2. Apples & Blueberries <input type="checkbox"/> 3. Apples, Mangos & Beets <input type="checkbox"/> 4. Apples, Oats & Cinnamon <input type="checkbox"/> 5. Bananas & Strawberries	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 6. Bananas & Sweet Potatoes <input type="checkbox"/> 7. Bananas, Blueberries & Beets <input type="checkbox"/> 8. Carrots <input type="checkbox"/> 9. Carrots & Peas <input type="checkbox"/> 10. Green Beans <input type="checkbox"/> 11. Pears <input type="checkbox"/> 12. Pears & Kale <input type="checkbox"/> 13. Pears & Prunes <input type="checkbox"/> 14. Pears, Mangos & Spinach <input type="checkbox"/> 15. Pears, Pineapple & Avocado <input type="checkbox"/> 16. Sweet Potatoes  <b><u>Pouches</u></b> <input type="checkbox"/> 17. Stage 1 Mangos <input type="checkbox"/> 18. Stage 1 Prunes <input checked="" type="checkbox"/> 19. Stage 2 Apple, Kale & Oats <input type="checkbox"/> 20. Stage 2 Apples & Carrots <input checked="" type="checkbox"/> 21. Stage 2 Apples, Blueberries & Oats <input type="checkbox"/> 22. Stage 2 Apples, Guavas & Beets <input type="checkbox"/> 23. Stage 2 Apples, Kale & Avocados <input type="checkbox"/> 24. Stage 2 Apples, Pumpkin & Carrots <input checked="" type="checkbox"/> 25. Stage 2 Apples, Spinach & Kale <input type="checkbox"/> 26. Stage 2 Apples, Sweet Potatoes & Granola <input type="checkbox"/> 27. Stage 2 Bananas, Beets & Blueberries <input type="checkbox"/> 28. Stage 2 Bananas, Pineapple, Avocado & Granola <input type="checkbox"/> 29. Stage 2 Bananas, Plums & Granola <input type="checkbox"/> 30. Stage 2 Bananas, Raspberries & Oats <input type="checkbox"/> 31. Stage 2 Bananas, Sweet Potatoes & Papayas <input type="checkbox"/> 32. Stage 2 Black Beans, Beets & Bananas <input type="checkbox"/> 33. Stage 2 Broccoli & Carrots with Olive Oil + Garlic <input type="checkbox"/> 34. Stage 2 Carrots, Strawberries & Chickpeas <input type="checkbox"/> 35. Stage 2 Green Beans, Spinach & Pears <input checked="" type="checkbox"/> 36. Stage 2 Pear, Raspberries & Oats <input type="checkbox"/> 37. Stage 2 Pears, Kale & Spinach <input type="checkbox"/> 38. Stage 2 Pears, Mangos & Spinach <input type="checkbox"/> 39. Stage 2 Pears, Peas & Broccoli <input type="checkbox"/> 40. Stage 2 Pears, Pumpkin & Passion Fruit <input type="checkbox"/> 41. Stage 2 Pears, Pumpkin, Peaches & Granola	<b><u>Pouches</u></b> 2020 – 2020 <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i>



Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 42. Stage 2 Pears, Squash & Blackberries <input type="checkbox"/> 43. Stage 2 Pears, Squash & Oats <input type="checkbox"/> 44. Stage 2 Pears, Zucchini & Peas <input type="checkbox"/> 45. Stage 2 Peas, Bananas & Kiwi <input type="checkbox"/> 46. Stage 2 Purple Carrot & Cauliflower with Avocado Oil + Oregano <input type="checkbox"/> 47. Stage 2 Purple Carrots, Bananas, Avocados & Quinoa <input type="checkbox"/> 48. Stage 2 Squash, Chickpeas & Spinach with Avocado Oil & Sage <input type="checkbox"/> 49. Stage 2 Squash, Pears & Apricots <input type="checkbox"/> 50. Stage 2 Sweet Potatoes with Olive Oil + Rosemary <input type="checkbox"/> 51. Stage 2 Sweet Potatoes, Mangos & Carrots <input type="checkbox"/> 52. Stage 2 Zucchini, Apples, Peas, Quinoa & Basil <input type="checkbox"/> 53. Stage 3 Harvest Vegetables & Chicken with Quinoa <input type="checkbox"/> 54. Stage 3 Root Vegetables & Turkey with Quinoa <input type="checkbox"/> 55. Stage 3 Vegetables & Beef medley with Quinoa <input type="checkbox"/> 56. Stage 4 Apples & butternut Squash + Super Chia <input type="checkbox"/> 57. Stage 4 Apples, Acai, Coconut Milk & Oats + Super Chia <input type="checkbox"/> 58. Stage 4 Apples, Cinnamon, Yogurt & Oats <input type="checkbox"/> 59. Stage 4 Apples, Mangos & Kale + Super Chia <input type="checkbox"/> 60. Stage 4 Apples, Spinach, Peas & Broccoli + Super Chia <input type="checkbox"/> 61. Stage 4 Apples, Sweet Potatoes, Carrots & Cinnamon + Super Chia <input type="checkbox"/> 62. Stage 4 Bananas, Beets & Strawberries <input type="checkbox"/> 63. Stage 4 Bananas, Beets, Squash & Blueberries <input type="checkbox"/> 64. Stage 4 Bananas, Blueberries, Yogurt & Oats <input type="checkbox"/> 65. Stage 4 Bananas, Carrots & Strawberries <input type="checkbox"/> 66. Stage 4 Bananas, Dragonfruit, Coconut milk & Oats + Super Chia <input type="checkbox"/> 67. Stage 4 Bananas, Mangos & Spinach	



Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<div data-bbox="440 319 1055 1184"> <input type="checkbox"/> 68. Stage 4 Bananas, Peaches &amp; Mangos + Super Chia  <input type="checkbox"/> 69. Stage 4 Bananas, Spinach &amp; Blueberries  <input type="checkbox"/> 70. Stage 4 Carrots, Bananas, Mangos &amp; Sweet Potatoes  <input type="checkbox"/> 71. Stage 4 Pears, Bananas, Sweet Potato &amp; Pumpkin + Super Chia  <input type="checkbox"/> 72. Stage 4 Pears, Beets &amp; Blackberries  <input type="checkbox"/> 73. Stage 4 Pears, Beets &amp; Blueberries + Super Chia  <input type="checkbox"/> 74. Stage 4 Pears, Blueberries &amp; Spinach  <input type="checkbox"/> 75. Stage 4 Pears, Green Beans &amp; Peas + Super Chia  <input type="checkbox"/> 76. Stage 4 Pears, Kiwi &amp; Kale  <input type="checkbox"/> 77. Stage 4 Pears, Mangos &amp; Spinach + Super Chia  <input type="checkbox"/> 78. Stage 4 Pears, Peaches, Pumpkin &amp; Apples  <input type="checkbox"/> 79. Stage 4 Pears, Raspberries, Carrots &amp; Butternut Squash  <input type="checkbox"/> 80. Stage 4 Spinach, Apples, Sweet Potatoes &amp; Kiwi  <input type="checkbox"/> 81. Stage 4 Zucchini, Pears, Chickpeas &amp; Kale </div> <div data-bbox="440 1203 535 1236"><b><u>Cereals</u></b></div> <div data-bbox="440 1247 699 1316"> <input type="checkbox"/> 82. Oatmeal  <input type="checkbox"/> 83. Oats &amp; Quinoa </div> <div data-bbox="440 1333 509 1369"><b><u>Puffs</u></b></div> <div data-bbox="440 1377 831 1614"> <input type="checkbox"/> 84. Apple &amp; Broccoli  <input type="checkbox"/> 85. Banana &amp; Pumpkin  <input type="checkbox"/> 86. Kale &amp; Spinach  <input type="checkbox"/> 87. Purple Carrot &amp; Blueberry  <input type="checkbox"/> 88. Strawberry &amp; Beet  <input type="checkbox"/> 89. Sweet Potato &amp; Carrot </div> <div data-bbox="440 1633 529 1669"><b><u>Snacks</u></b></div> <div data-bbox="440 1677 1016 1915"> <input type="checkbox"/> 90. Creamies Apple, Spinach, Pea &amp; Kiwi  <input type="checkbox"/> 91. Creamies Strawberry, Raspberry &amp; Carrot  <input type="checkbox"/> 92. Greek Yogis Banana Mango  <input type="checkbox"/> 93. Greek Yogis Blueberry &amp; Purple Carrot  <input type="checkbox"/> 94. Greek Yogis Mixed Berry  <input type="checkbox"/> 95. Greek Yogis Strawberry </div>	<div data-bbox="1081 1642 1174 1677"><b><u>Snacks</u></b></div> <div data-bbox="1081 1686 1437 1923"> 2020 – 2020  <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i> </div>

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 96. Greek Yogis Strawberry Banana <input type="checkbox"/> 97. Snackers Creamy Spinach & Carrot <input type="checkbox"/> 98. Snackers Tomato & Basil <input type="checkbox"/> 99. Teethers Apple, Carrot & Cinnamon Muffin <input checked="" type="checkbox"/> 100. Teethers Blueberry & Purple Carrot <input checked="" type="checkbox"/> 101. Teethers Mango & Pumpkin with Amaranth <input type="checkbox"/> 102. Teethers Pancake & Waffle Mix <input type="checkbox"/> 103. Teethers Pea & Spinach <input checked="" type="checkbox"/> 104. Teethers Strawberry & Beet with Amaranth <input type="checkbox"/> 105. Teethers Sweet Potato & Banana <input type="checkbox"/> 106. Teethers Waffle/Muffin Mix  <b><u>Bars</u></b> <input type="checkbox"/> 107. Apple + Cinnamon Fruit & Oat <input type="checkbox"/> 108. Banana + Chocolate Fruit & Oat <input type="checkbox"/> 109. Bananas & Carrots <input type="checkbox"/> 110. Blueberry & Raspberry Fruit & Oat <input type="checkbox"/> 111. Mango & Sweet Potato Fruit, Veggie & Oat <input type="checkbox"/> 112. Raspberry & Butternut Squash Fruit, Veggie & Oat  <b><u>Bowls</u></b> <input type="checkbox"/> 113. Beef & Quinoa Fiesta with vegetable Salsa <input type="checkbox"/> 114. Cheese & Spinach Ravioli <input type="checkbox"/> 115. Cheesy Lentils & Quinoa <input type="checkbox"/> 116. Mac & Cheese <input type="checkbox"/> 117. Squash Ravioli <input type="checkbox"/> 119. Turkey Bolognese <input type="checkbox"/> 120. Veggies & Wild Rice with Mushrooms & Parmesan Bowl  <b><u>Cookies</u></b> <input type="checkbox"/> 121. Cinnamon & Sweet Potato + Flaxseed Multi- grain <input type="checkbox"/> 122. Vanilla Oat + Flaxseed Multi-grain	
<b>E. Plum</b>	<b><u>Pouches</u></b> <input type="checkbox"/> 1. Stage 1 Peaches <input type="checkbox"/> 2. Stage 1 Sweet Potato <input type="checkbox"/> 3. Stage 1 Mangos <input type="checkbox"/> 4. Stage 1 Prunes <input type="checkbox"/> 5. Stage 2 Pear, Blueberry, Avocado & Granola	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 6. Stage 2 Strawberry, Banana & Granola <input type="checkbox"/> 7. Stage 2 Mango, Carrot & Coconut Cream <input type="checkbox"/> 8. Stage 2 Butternut Squash, Carrot, Chickpea & Corn <input type="checkbox"/> 9. Stage 2 Peach, Banana & Apricot <input type="checkbox"/> 10. Stage 2 Sweet Potato, Apple & Corn <input type="checkbox"/> 11. Stage 2 Apple & Carrot <input type="checkbox"/> 12. Stage 2 Guava, Pear & Pumpkin <input type="checkbox"/> 13. Stage 2 Apple, Spinach & Avocado <input type="checkbox"/> 14. Stage 2 Apple, Raisin & Quinoa <input type="checkbox"/> 15. Stage 2 Apple, Blackberry & Coconut Cream <input type="checkbox"/> 16. Stage 2 Banana & Pumpkin <input type="checkbox"/> 17. Stage 2 Apple, Raspberry, Spinach & Greek Yogurt <input type="checkbox"/> 18. Stage 2 Pea, Kiwi, Pear & Avocado <input type="checkbox"/> 19. Stage 2 Pear, Green Bean & Greek Yogurt <input type="checkbox"/> 20. Stage 2 Pear & Mango <input type="checkbox"/> 21. Stage 2 Peach, Pumpkin, Carrot & Cinnamon <input type="checkbox"/> 22. Stage 2 Banana, Zucchini & Amaranth <input type="checkbox"/> 23. Stage 2 Mango, Sweet Potato, Apple & Millet <input type="checkbox"/> 24. Stage 2 Mango, Yellow Zucchini, Corn & Turmeric <input type="checkbox"/> 25. Stage 2 Apple & Broccoli <input type="checkbox"/> 26. Stage 2 Apple, Plum, Berry & Barley <input type="checkbox"/> 27. Stage 2 Pear, Spinach & Pea <input type="checkbox"/> 28. Stage 2 Apple, Cauliflower & Leek <input type="checkbox"/> 29. Stage 2 Carrots, Beans, Spinach & Tomato <input type="checkbox"/> 30. Stage 2 Pumpkin, Spinach, Chickpea & Broccoli <input type="checkbox"/> 31. Stage 2 Kale, Corn, Carrot & Tomato <input type="checkbox"/> 32. Stage 2 Pear, Purple Carrot & Blueberry <input type="checkbox"/> 33. Stage 3 Carrot, Spinach, Turkey, Corn, Apple & Potato <input type="checkbox"/> 34. Stage 3 Carrot, Sweet Potato, Corn, Pea, Chicken <input type="checkbox"/> 35. Stage 3 Carrot, Chickpea, Pea, Beef & Tomato <input type="checkbox"/> 36. Stage/Mighty 4 Banana, Blueberry, Sweet Potato, Carrot, Greek Yogurt & Millet	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 37. Stage/Mighty 4 Banana, Kiwi, Spinach, Greek Yogurt & Barley <input type="checkbox"/> 38. Stage/Mighty 4 Banana, Peach, Pumpkin, Carrot, Greek Yogurt & Oats <input type="checkbox"/> 39. Stage/Mighty 4 Guava, Pomegranate, Black Bean, Carrot & Oat <input type="checkbox"/> 40. Stage/Mighty 4 Mango, Pineapple, White Bean, Butternut Squash & Oats <input type="checkbox"/> 41. Stage/Mighty 4 Pear, Cherry, Blackberry, Strawberry, Black Bean, Spinach & Oats <input type="checkbox"/> 42. Stage/Mighty 4 Strawberry Banana, Greek Yogurt, Kale, Oat & Amaranth <input type="checkbox"/> 43. Stage/Mighty 4 Sweet Potato, Banana & Passion Fruit, Greek Yogurt & Oats <input type="checkbox"/> 44. Mighty Morning Banana, Blueberry, Oat, Quinoa <input type="checkbox"/> 45. Mighty Protein & Fiber Banana, White Bean, Strawberry & Chia <input type="checkbox"/> 46. Mighty Protein & Fiber Pear, White Bean, Blueberry Date & Chia <input type="checkbox"/> 47. Mighty Veggie Carrot, pear, Pomegranate & Oats <input type="checkbox"/> 48. Mighty Veggie Spinach, Grape, Apple & Amaranth <input type="checkbox"/> 49. Mighty Veggie Sweet Potato, Apple, Banana & Carrot <input type="checkbox"/> 50. Mighty Veggie Zucchini, Apple, Watermelon & Barley  <b><u>Super Puffs</u></b> <input type="checkbox"/> 51. Apple with Spinach <input type="checkbox"/> 52. Blueberry with Purple Sweet Potato <input type="checkbox"/> 53. Mango with Sweet Potato <input type="checkbox"/> 54. Strawberry with Beet  <b><u>Teethers</u></b> <input type="checkbox"/> 55. Apple with Leafy Greens <input type="checkbox"/> 56. Banana with Pumpkin <input type="checkbox"/> 57. Blueberry  <b><u>Bars</u></b> <input type="checkbox"/> 58. Almond Butter <input type="checkbox"/> 59. Apple Cinnamon	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 60. Apple Cinnamon & Oatmeal Bar <input type="checkbox"/> 61. Blueberry <input type="checkbox"/> 62. Blueberry & Oatmeal Bar <input type="checkbox"/> 63. Blueberry Lemon <input type="checkbox"/> 64. Jammy Sammy <input type="checkbox"/> 65. Mighty Snack bars <input type="checkbox"/> 66. Peanut Butter <input type="checkbox"/> 67. Peanut Butter & Grape Bar <input type="checkbox"/> 68. Peanut Butter & Strawberry Bar <input type="checkbox"/> 69. Pumpkin Banana <input type="checkbox"/> 70. Strawberry  <b><u>Mashups</u></b> <input type="checkbox"/> 71. Applesauce Blueberry Carrot <input type="checkbox"/> 72. Applesauce Carrot & Mango <input type="checkbox"/> 73. Applesauce Strawberry & Banana <input type="checkbox"/> 74. Applesauce Strawberry & Beet  <b><u>Teensy Snacks</u></b> <input type="checkbox"/> 75. Berry <input type="checkbox"/> 76. Peach	
<b>F. Sprout Foods</b>	<b><u>Pouches</u></b> <input type="checkbox"/> 1. Toddler Apple with Apricot & Strawberry <input type="checkbox"/> 2. Toddler Berry Grape <input type="checkbox"/> 3. Toddler Blueberry Banana <input type="checkbox"/> 4. Toddler Peach <input type="checkbox"/> 5. Toddler Strawberry <input type="checkbox"/> 6. Toddler Strawberry and Banana with Squash <input type="checkbox"/> 7. Toddlers Butternut Squash with pineapple and Papaya <input type="checkbox"/> 8. Toddlers Green Veggies <input type="checkbox"/> 9. Toddlers Kiwi with Super blend banana & spinach <input type="checkbox"/> 10. Toddlers Purple Carrot, Strawberry & Grape <input type="checkbox"/> 11. Toddlers Sweet potato Peach & Carrots <input type="checkbox"/> 12. Stage 2 Apple Banana, Butternut Squash <input type="checkbox"/> 13. Stage 2 Apple Blueberry <input type="checkbox"/> 14. Stage 2 Apple, Oatmeal Raisin with Cinnamon <input type="checkbox"/> 15. Stage 2 Apricot Peach, Pumpkin	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 16. Stage 2 Apricot, Banana, Chickpea Fig <input type="checkbox"/> 17. Stage 2 Blueberry, Banana Oatmeal <input type="checkbox"/> 18. Stage 2 Butternut Blueberry Apple with Beans <input type="checkbox"/> 19. Stage 2 Butternut, Carrot & Apple with Beef Broth <input type="checkbox"/> 20. Stage 2 Carrot Chickpeas, Zucchini Pear <input type="checkbox"/> 21. Stage 2 Carrot, Apple, Mango <input type="checkbox"/> 22. Stage 2 Mixed Berry Oatmeal <input type="checkbox"/> 23. Stage 2 Peach Oatmeal with Coconut Milk & Pineapple <input type="checkbox"/> 24. Stage 2 Pear, Kiwi, Peas, Spinach <input type="checkbox"/> 25. Stage 2 Strawberry, Apple, Beet, Red Beans <input type="checkbox"/> 26. Stage 2 Strawberry, Pear, Banana <input type="checkbox"/> 27. Stage 2 Sweet Potato, Apple, Spinach <input type="checkbox"/> 28. Stage 2 Sweet Potato, White Beans with Cinnamon <input type="checkbox"/> 29. Stage 2 Vegetables & Pear with Chicken Broth <input type="checkbox"/> 30. Stage 3 Butternut Chickpea Quinoa Dates <input type="checkbox"/> 31. Stage 3 Creamy Vegetables with Chicken <input type="checkbox"/> 32. Stage 3 Garden Vegetables Brown Rice with Turkey <input type="checkbox"/> 33. Stage 3 Harvest Vegetables Apricot with Chicken <input type="checkbox"/> 34. Stage 3 Market Vegetable Pear with Turkey <input type="checkbox"/> 35. Stage 3 Pumpkin Apple Red Lentin with Cinnamon <input type="checkbox"/> 36. Stage 3 Root Vegetables Apple with Beef <input type="checkbox"/> 37. Stage 3 Sweet Pea Carrot Corn White Bean  <b><u>Toddler Meals</u></b> <input type="checkbox"/> 38. Baby Burrito Bowl <input type="checkbox"/> 39. Butternut Mac & Cheese <input type="checkbox"/> 40. Pasta with Veggie Sauce <input type="checkbox"/> 41. Veggie Power Bowl  <b><u>Puffs</u></b> <input type="checkbox"/> 42. Apple Kale Power Puffs <input type="checkbox"/> 43. Carrot Peach Mango Plant	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<b><u>Snacks</u></b> <input type="checkbox"/> 44. Crinkles Cheddar and Spinach <input type="checkbox"/> 45. Crinkles Pumpkin and Carrot <input type="checkbox"/> 46. Crispy Chews Apples & Strawberry <input type="checkbox"/> 47. Crispy Chews Beet & Berry <input type="checkbox"/> 48. Crispy Chews Orchard Fruit & Carrot <input type="checkbox"/> 49. Curlz Broccoli <input type="checkbox"/> 50. Curlz Sweet Potato & Cinnamon <input type="checkbox"/> 51. Curlz White Cheddar Broccoli <input type="checkbox"/> 52. Wafflez Blueberry Apple <input type="checkbox"/> 53. Wafflez Pumpkin Butter & Jelly	
G. Walmart	<b><u>Jars and Tubs</u></b> <input type="checkbox"/> 1. Stage 1 Apple Baby Food <input type="checkbox"/> 2. Stage 1 Banana Food <input type="checkbox"/> 3. Stage 1 Butternut Squash Baby Food <input type="checkbox"/> 4. Stage 1 Carrot Baby Food <input type="checkbox"/> 5. Stage 1 Natural Apple Baby Food <input type="checkbox"/> 6. Stage 1 Pear Baby Food <input type="checkbox"/> 7. Stage 2 Apple Strawberry Baby Food <input type="checkbox"/> 8. Stage 2 Banana Baby Food <input type="checkbox"/> 9. Stage 2 Butternut Squash Pineapple Baby Food <input type="checkbox"/> 10. Stage 2 Sweet Potato Baby Food  <b><u>Pouches</u></b> <input type="checkbox"/> 11. Apple <input type="checkbox"/> 12. Banana <input type="checkbox"/> 13. Banana Berry Burst <input type="checkbox"/> 14. BBQ Seasoned Chicken Roasted Corn <input type="checkbox"/> 15. Berry & Oats <input type="checkbox"/> 16. Blueberry Apple Yogurt <input type="checkbox"/> 17. Blueberry Kale Rice <input type="checkbox"/> 18. Butternut Squash <input type="checkbox"/> 19. Carrot Zucchini Broccoli <input type="checkbox"/> 20. Cheesy Potato <input type="checkbox"/> 21. Chicken Noodle <input type="checkbox"/> 22. Green Bean <input type="checkbox"/> 23. Macaroni and Cheese <input type="checkbox"/> 24. Mango Banana Kale	

Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
	<input type="checkbox"/> 25. Organic Pear <input type="checkbox"/> 26. Pea White Chicken <input type="checkbox"/> 27. Root Veggies Apple <input type="checkbox"/> 28. Strawberry Banana Yogurt <input type="checkbox"/> 29. Strawberry Carrot Quinoa <input type="checkbox"/> 30. Strawberry Yogurt <input type="checkbox"/> 31. Sweet Potato Apple Grape <input type="checkbox"/> 32. Sweet Potato Cinnamon <input type="checkbox"/> 33. Sweet Potato Turkey <input type="checkbox"/> 34. Tropical Burst  <u><b>Puffs</b></u> <input checked="" type="checkbox"/> 35. Banana Puffs <input checked="" type="checkbox"/> 36. Blueberry Puffs <input type="checkbox"/> 37. Peach Mango Puffs <input checked="" type="checkbox"/> 38. Strawberry Apple Puffs <input type="checkbox"/> 39. Strawberry Yogurt Puffs <input checked="" type="checkbox"/> 40. Sweet Potato Puffs  <u><b>Snacks</b></u> <input checked="" type="checkbox"/> 41. Blueberry Rice Rusks <input type="checkbox"/> 42. Organic Apple Rice Rusks <input checked="" type="checkbox"/> 43. Organic Banana Rice Rusks <input checked="" type="checkbox"/> 44. Organic Strawberry Rice Rusks  <u><b>Yogurt Bites</b></u> <input type="checkbox"/> 45. Banana Yogurt Bites <input type="checkbox"/> 46. Cherry Vanilla Yogurt Bites <input type="checkbox"/> 47. Mixed Berry Yogurt Bites <input type="checkbox"/> 48. Peach Yogurt Bites <input type="checkbox"/> 49. Strawberry Yogurt Bites	<u><b>Puffs</b></u> 2020 – 2020 <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i>  <u><b>Snacks</b></u> 2020 – 2020 <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i>

- ☐ (Optional): In addition to the products specified above, which are subject to confirmation with discovery materials, Plaintiff consumed the following types and flavors of products from the above Defendants and contends that these additional products caused and/or contributed to Plaintiff's injury(ies). For each additional product, identify the Defendant(s) and **the approximate time period of consumption by product category:**

\_\_\_\_\_

\_\_\_\_\_



Manufacturer/ Brand	Product List (Select All Applicable Products)	Approximate Time Period of Consumption by Product Category
<b>Gerber</b>	<u><b>Baby Formula</b></u> <input type="checkbox"/> 1. Good Start A2 Powder Infant Formula <input type="checkbox"/> 2. Good Start A2 Toddler Drink <input type="checkbox"/> 3. Good Start Extensive HA Powder Infant Formula <input type="checkbox"/> 4. Good Start Gentle Powder Infant Formula <input type="checkbox"/> 5. Good Start GentlePro 2 Powder Infant Formula <input type="checkbox"/> 6. Good Start GentlePro Concentrated Liquid Infant Formula <input type="checkbox"/> 7. Good Start GentlePro Powder Infant Formula <input type="checkbox"/> 8. Good Start GentlePro Ready to Feed Infant Formula <input type="checkbox"/> 9. Good start GentlePro Ready to Feed Infant Formula Nursers <input type="checkbox"/> 10. Good Start Grow Nutritious Toddler Drink Powder <input checked="" type="checkbox"/> 11. Good Start SoothePro Powder Infant Formula <input type="checkbox"/> 12. Good Start Soy 2 Powder Infant & Toddler Formula <input type="checkbox"/> 13. Good Start Soy Powder Infant Formula <input type="checkbox"/> 14. Good Start Soy Ready Feed Infant Formula Nursers <input type="checkbox"/> 15. Good Start Soy Ready to Feed Infant Formula <input type="checkbox"/> 16. NAN Pro Infant Formula <input type="checkbox"/> 17. NAN Pro Toddler Drink	<u><b>Baby Formula</b></u> 2020 – 2020 <i>Additionally, products that Plaintiff consumed, and the time period of consumption, may be reflected in retailer records in the possession of third parties.</i>
<b>Hain</b>	<u><b>Baby Formula</b></u> <input type="checkbox"/> 1. Non-GMO Plant Based Soy Baby Formula <input type="checkbox"/> 2. Organic Dairy – No Added DHA Infant Formula with Iron Organic Milk-Based Powder <input type="checkbox"/> 3. Organic Dairy Infant Formula with Iron Milk-Based Powder <input type="checkbox"/> 4. Organic Gentle Infant Formula with Iron Milk-Based Powder <input type="checkbox"/> 5. Organic Sensitivity Infant Formula with Iron Milk-Based Powder <input type="checkbox"/> 6. Organic Toddler Milk Drink Powder	
<b>Nurture</b>	<u><b>Baby Formula</b></u> <input type="checkbox"/> 1. Stage 1 Modeled After Breast Milk <input type="checkbox"/> 2. Stage 1 Sensitive <input type="checkbox"/> 3. Stage 2 Modeled After Breast Milk	

<b>Walmart</b>	<b><u>Baby Formula</u></b> <input type="checkbox"/> 1. Added Rice Starch Infant Formula with Iron Milk-Based Powder <input type="checkbox"/> 2. Advantage Infant Formula Milk Based Powder with Iron <input type="checkbox"/> 3. Gentle Infant Formula Milk-Based Powder with Iron <input type="checkbox"/> 4. Infant DHA & Choline Nutrients Found in Breast Milk <input type="checkbox"/> 5. Infant Formula Milk-Based Powder with Iron <input type="checkbox"/> 6. Organic Infant Formula with Iron Milk-Based Powder <input type="checkbox"/> 7. Sensitivity Infant Formula Milk-Based Powder with Iron <input type="checkbox"/> 8. Soy For Fussiness & Gas <input type="checkbox"/> 9. Soy Infant Formula with Iron Soy-Based Powder <input type="checkbox"/> 10. Tender Infant Formula with Iron Milk-Based Powder	
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3. Plaintiff's exposure to each Defendant's Baby Food product(s), or each Defendant's subsidiary's Baby Food product(s) as alleged above, was a substantial contributing factor to, and caused Plaintiff to suffer brain injuries and other neurodevelopmental harms that manifested in a constellation of behaviors diagnosed as:

- ☒ Autism Spectrum Disorder ("ASD")
- ☐ Attention Deficit Hyperactivity Disorder ("ADHD")
- ☐ Other \_\_\_\_\_
- ☐ Other \_\_\_\_\_

#### IV. CAUSES OF ACTION

1. Defendant(s) Baby Food product(s) proximately caused the injuries to Plaintiff.
2. Counts in the first Amended Master Complaint brought by Plaintiff:

☒ **Count I: Strict Products Liability—Failure to Warn**

<b>Check All Applicable Defendants</b>	<b>Defendant(s)</b>
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company (“Beech-Nut”)
<input type="checkbox"/>	The Campbell’s Company (“Campbell”)
<input checked="" type="checkbox"/>	Danone North America, PBC (“Danone North America”)
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV (“Danone ELN”)
<input checked="" type="checkbox"/>	Gerber Products Company (“Gerber”)
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. (“Hain”)
<input type="checkbox"/>	Neptune Wellness Solutions (“Neptune”)
<input checked="" type="checkbox"/>	Nestlé USA, Inc. (“Nestlé USA”)
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. (“Nestlé Enterprises”)
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. (“SPN”)
<input type="checkbox"/>	Nurture, LLC (“Nurture”)
<input type="checkbox"/>	Plum, PBC (“Plum”)
<input type="checkbox"/>	Sprout Foods, Inc. (“Sprout Foods”)
<input type="checkbox"/>	Sun-Maid Growers of California (“Sun-Maid”)
<input checked="" type="checkbox"/>	Walmart Inc. (“Walmart”)

☒ **Count II: Strict Products Liability—Manufacturing Defect**

<b>Check All Applicable Defendants</b>	<b>Defendant(s)</b>
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company (“Beech-Nut”)
<input type="checkbox"/>	The Campbell’s Company (“Campbell”)
<input checked="" type="checkbox"/>	Danone North America, PBC (“Danone North America”)
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV (“Danone ELN”)
<input checked="" type="checkbox"/>	Gerber Products Company (“Gerber”)
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. (“Hain”)
<input type="checkbox"/>	Neptune Wellness Solutions (“Neptune”)
<input checked="" type="checkbox"/>	Nestlé USA, Inc. (“Nestlé USA”)
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. (“Nestlé Enterprises”)
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. (“SPN”)
<input type="checkbox"/>	Nurture, LLC (“Nurture”)
<input type="checkbox"/>	Plum, PBC (“Plum”)
<input type="checkbox"/>	Sprout Foods, Inc. (“Sprout Foods”)
<input type="checkbox"/>	Sun-Maid Growers of California (“Sun-Maid”)
<input checked="" type="checkbox"/>	Walmart Inc. (“Walmart”)

☒ **Count III: Strict Products Liability—Design Defect**

<b>Check All Applicable Defendants</b>	<b>Defendant(s)</b>
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company (“Beech-Nut”)
<input type="checkbox"/>	The Campbell’s Company (“Campbell”)
<input checked="" type="checkbox"/>	Danone North America, PBC (“Danone North America”)
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV (“Danone ELN”)
<input checked="" type="checkbox"/>	Gerber Products Company (“Gerber”)
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. (“Hain”)
<input type="checkbox"/>	Neptune Wellness Solutions (“Neptune”)
<input checked="" type="checkbox"/>	Nestlé USA, Inc. (“Nestlé USA”)
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. (“Nestlé Enterprises”)
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. (“SPN”)
<input type="checkbox"/>	Nurture, LLC (“Nurture”)
<input type="checkbox"/>	Plum, PBC (“Plum”)
<input type="checkbox"/>	Sprout Foods, Inc. (“Sprout Foods”)
<input type="checkbox"/>	Sun-Maid Growers of California (“Sun-Maid”)
<input checked="" type="checkbox"/>	Walmart Inc. (“Walmart”)

☒ **Count IV: Negligence—Failure to Warn**

<b>Check All Applicable Defendants</b>	<b>Defendant(s)</b>
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company (“Beech-Nut”)
<input type="checkbox"/>	The Campbell’s Company (“Campbell”)
<input checked="" type="checkbox"/>	Danone North America, PBC (“Danone North America”)
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV (“Danone ELN”)
<input checked="" type="checkbox"/>	Gerber Products Company (“Gerber”)
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. (“Hain”)
<input type="checkbox"/>	Neptune Wellness Solutions (“Neptune”)
<input checked="" type="checkbox"/>	Nestlé USA, Inc. (“Nestlé USA”)
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. (“Nestlé Enterprises”)
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. (“SPN”)
<input type="checkbox"/>	Nurture, LLC (“Nurture”)
<input type="checkbox"/>	Plum, PBC (“Plum”)
<input type="checkbox"/>	Sprout Foods, Inc. (“Sprout Foods”)
<input type="checkbox"/>	Sun-Maid Growers of California (“Sun-Maid”)
<input checked="" type="checkbox"/>	Walmart Inc. (“Walmart”)

☒ **Count V: Negligence—Manufacturing**

<b>Check All Applicable Defendants</b>	<b>Defendant(s)</b>
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company (“Beech-Nut”)
<input type="checkbox"/>	The Campbell’s Company (“Campbell”)
<input checked="" type="checkbox"/>	Danone North America, PBC (“Danone North America”)
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV (“Danone ELN”)
<input checked="" type="checkbox"/>	Gerber Products Company (“Gerber”)
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. (“Hain”)
<input type="checkbox"/>	Neptune Wellness Solutions (“Neptune”)
<input checked="" type="checkbox"/>	Nestlé USA, Inc. (“Nestlé USA”)
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. (“Nestlé Enterprises”)
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. (“SPN”)
<input type="checkbox"/>	Nurture, LLC (“Nurture”)
<input type="checkbox"/>	Plum, PBC (“Plum”)
<input type="checkbox"/>	Sprout Foods, Inc. (“Sprout Foods”)
<input type="checkbox"/>	Sun-Maid Growers of California (“Sun-Maid”)
<input checked="" type="checkbox"/>	Walmart Inc. (“Walmart”)

☒ **Count VI: Negligence—Product Design**

<b>Check All Applicable Defendants</b>	<b>Defendant(s)</b>
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company (“Beech-Nut”)
<input type="checkbox"/>	The Campbell’s Company (“Campbell”)
<input checked="" type="checkbox"/>	Danone North America, PBC (“Danone North America”)
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV (“Danone ELN”)
<input checked="" type="checkbox"/>	Gerber Products Company (“Gerber”)
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. (“Hain”)
<input type="checkbox"/>	Neptune Wellness Solutions (“Neptune”)
<input checked="" type="checkbox"/>	Nestlé USA, Inc. (“Nestlé USA”)
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. (“Nestlé Enterprises”)
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. (“SPN”)
<input type="checkbox"/>	Nurture, LLC (“Nurture”)
<input type="checkbox"/>	Plum, PBC (“Plum”)
<input type="checkbox"/>	Sprout Foods, Inc. (“Sprout Foods”)
<input type="checkbox"/>	Sun-Maid Growers of California (“Sun-Maid”)
<input checked="" type="checkbox"/>	Walmart Inc. (“Walmart”)

☒ **Count VII: General Negligence**

<b>Check All Applicable Defendants</b>	<b>Defendant(s)</b>
<input checked="" type="checkbox"/>	Beech-Nut Nutrition Company ("Beech-Nut")
<input type="checkbox"/>	The Campbell's Company ("Campbell")
<input checked="" type="checkbox"/>	Danone North America, PBC ("Danone North America")
<input checked="" type="checkbox"/>	Danone Nutricia Nederland BV ("Danone ELN")
<input checked="" type="checkbox"/>	Gerber Products Company ("Gerber")
<input checked="" type="checkbox"/>	Hain Celestial Group, Inc. ("Hain")
<input type="checkbox"/>	Neptune Wellness Solutions ("Neptune")
<input checked="" type="checkbox"/>	Nestlé USA, Inc. ("Nestlé USA")
<input checked="" type="checkbox"/>	Nestlé Enterprises S.A. ("Nestlé Enterprises")
<input checked="" type="checkbox"/>	Société des Produits Nestlé S.A. ("SPN")
<input type="checkbox"/>	Nurture, LLC ("Nurture")
<input type="checkbox"/>	Plum, PBC ("Plum")
<input type="checkbox"/>	Sprout Foods, Inc. ("Sprout Foods")
<input type="checkbox"/>	Sun-Maid Growers of California ("Sun-Maid")
<input checked="" type="checkbox"/>	Walmart Inc. ("Walmart")

☐ **Other Causes of Action (list on a per Defendant basis), attach additional pages if necessary:**

\_\_\_\_\_

\_\_\_\_\_

3. As a result of the injuries Plaintiff sustained, Plaintiff is entitled to recover against each Defendant:

- A. Actual or compensatory damages for past, present, and future (1) pain and suffering; (2) emotional distress; and (3) economic loss in an amount to be proven at trial;
- B. Exemplary and punitive damages in an amount sufficient to punish and deter Defendant(s) from future wrongful practice;
- C. Pre-Judgment and post-Judgment interest;
- D. Costs including reasonable attorneys' fees, court costs, and other litigation expenses; and
- E. Any other relief the Court may deem just and proper.

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## **V. JURY DEMAND**

1. Plaintiff hereby demands a trial by jury as to all claims in this action.

**VI. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff has been damaged as a result of Defendants' actions or inactions and demand(s) judgment against Defendants on each of the above-referenced causes of action, jointly and severally to the full extent available in law or equity, as requested in the First Amended Master Complaint for compensatory and punitive damages.

Dated: July 7, 2025

Respectfully Submitted,

/s/ Pedram Esfandiary

Pedram Esfandiary (SBN: 312569)

[pesfandiary@wisnerbaum.com](mailto:pesfandiary@wisnerbaum.com)

R. Brent Wisner (SBN: 276023)

[rbwisner@wisnerbaum.com](mailto:rbwisner@wisnerbaum.com)

Monique Alarcon (SBN: 311650)

[malarcon@wisnerbaum.com](mailto:malarcon@wisnerbaum.com)

Mayra Maturana (SBN: 346539)

[mmaturana@wisnerbaum.com](mailto:mmaturana@wisnerbaum.com)

**WISNER BAUM, LLP**

11111 Santa Monica Blvd., Suite 1750

Los Angeles, CA 90025

Tel: (310) 207-3233

Fax: (310) 820-7444

*Counsel for Plaintiff*